



State of Ohio Environmental Protection Agency

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George V. Voinovich
Governor

August 14, 1998

**RE: Master Metals, Inc. Site - Engineering
Evaluation and Cost analysis Report**

Mr. Jeff Heath
U.S. EPA Region 5
77 W. Jackson Blvd. SR-6J
Chicago, IL 60604-3590

Dear Mr. ~~Harris~~:

The revised Engineering Evaluation and Cost Analysis (EE/CA) Report for the Master Metals Site in Cleveland, Ohio, along with the responses to comments was received by this office on July 22, 1998.

Ohio EPA has the following comments on the revised report and the responses to the Agency's comments. Please note that some of the comments refer to the Executive Summary which had not been provided to the Agencies in the previous submittal.

Executive Summary:

Comment #1: Ohio EPA recommends that any information available on zoning restrictions also be referenced in the discussion of future land use.

Comment #2 : The last paragraph on the alternative selected may need to be amplified, based on Agency comments.

Section 2.0 Site Characterization

Comment #3 (page 18, Figure 2.8, also pages 31, 35, and 39 in section 4.0): Ohio EPA has concerns regarding whether an appropriate receptor was identified in the development of the off-property risk-based remediation goal for lead. Please refer to the streamlined risk assessment conducted by U.S. EPA for this site, in which both a routine industrial worker and a construction worker have been identified as receptors. Ohio EPA agrees that a routine industrial worker would be an appropriate receptor in the development of *on-site* remediation standards. However, for the off-property perimeter areas with high lead levels, unless enforceable mechanisms can be put in place that would limit contact in these areas to the routine industrial worker, Ohio EPA would recommend that the construction worker be considered the appropriate receptor for the off-property contaminated soils identified. (This comment is also applicable to section 4.0.)

Comment #4 (page 18): Please also note that the preferred alternative, Alternative 2, does not involve on-site remediation and achievement of the routine industrial receptor risk-based standards derived for this site. Rather, the alternative calls for an on-site cover system, and thus

Mr. Jeff Heath
U.S. EPA Region 5
August 14, 1998
Page 2

the mitigation of risk, by ensuring that the exposure pathway for direct-contact soils is incomplete.

? **Section 4.0 Identification and analysis of Removal Action Alternatives**

Comment #5 (page 31, page 35, page 39): Comments on the appropriate receptor identified in the off-property risk-based remediation standard have been previously made. However, if a depth-based point of compliance (of 2 feet) for the off-property identified areas is chosen rather than a risk-based level, it is unclear how direct-contact below that point of compliance could be ensured (i.e., how enforceable mechanisms could be put in place limiting exposure below the point of compliance).

- ✓ *Comment #6* (page 31, page 35, response to Ohio EPA comment 2A(I)): OEPA believes that off-site soils should be tested by the TCLP procedure to determine if they are hazardous wastes, as per the RCRA regulations. If the waste exceeds the RCRA toxic threshold, it should be treated prior to disposal on the site. Otherwise, that action would constitute disposal of hazardous wastes at a nonregulation facility. While the response to comments seems to address our concerns, the main body of the EE/CA is unchanged on that subject (please see Alternatives 2 and 3). Also, the costs estimates for those two alternatives do not include specific funding for treatment, should it be necessary. There is a contingency item in the budget for those alternatives, but the EE/CA does not address whether that contingency would be adequate for extensive pretreatment of consolidated material.

Further, the assertion, in Sections 4 and 5, that these alternatives would comply with ARAR's may not be accurate. These alternatives would violate the rules on disposal of hazardous wastes, unless the offsite soils are non-hazardous (or treated to make them non-hazardous).

- ✓ *Comment #7* (page 31, response to Ohio EPA comment 2A(ii)): It is not entirely clear from the EE/CA, and especially from Figure 4-1, that the two foot final cover thickness will be measured from the top of the consolidated material rather than from the top of the concrete. Please clarify that two feet of cover means two feet over any consolidated contaminated material.

Further, district and Central Office Ohio EPA personnel are planning a site visit on August 19, to evaluate the response to Comment #2A(ii). We would appreciate consideration of any additional comments (on the depth of soil cover proposed as part of Alternative 2) generated and transmitted to U.S. EPA subsequent to the site visit.

- ✓ *Comment #8 (Appendix B)*: The Figure referenced in the appendix, as also the literature sources cited have not been provided in the copy of the report provided to Ohio EPA. Please provide this, as appropriate.

Mr. Jeff Heath
U.S. EPA Region 5
August 14, 1998
Page 3

Finally, please note that the response to the EE/CA (comment #2A. v) makes a reference to the cover design and installation. It should be ensured that any such detailed proposal is reviewed and approved by the Agencies, as appropriate.

Please let me know if I can clarify any of my comments.

Sincerely,



Sheila Abraham
Environmental Specialist
Division of Emergency and Remedial Response

SA:cl

cc: Bob Princic, Ohio EPA, DERR-NEDO
Tim Christman, Ohio EPA, DERR-CO
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